

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

THE ESTATE OF CARLOS BONILLA,  
AND JOANNA BONILLA, AS  
ADMINISTRATOR OF THE ESTATE OF  
CARLOS BONILLA,

Plaintiff,

v.

COUNTY OF HUDSON, NEW JERSEY;  
HUDSON COUNTY CORRECTIONAL  
CENTER; CFG HEALTH SYSTEMS, LLC;  
EVELYN BERNARDO; CLAUDETTE  
BLAKE; TAMMY COOPER; DAISY  
DORONILA; PAUL ITTOOP; JANE  
LOWE; TERESA O'BRIEN; MYRIAM  
STERLIN; ERIC TAYLOR; AND  
JOHN/JANE DOE HEALTHCARE  
PROVIDERS 1-5,

Defendants.

Civil Action No. 2:19-CV-13137

**Plaintiff's Affidavit of Merit by Dr. Alyson Fox, M.D.**

Attached for filing pursuant to N.J.S.A. 2A:53A-26, *et seq.*, is Plaintiff's Affidavit of Merit by

Dr. Alyson Fox, M.D.

Dated: August 22, 2019

/s/ Michelle H. Yeary

Michelle H. Yeary, Esq.

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**AFFIDAVIT OF MERIT**

Dr. Alyson Fox, M.D, of full age, being duly sworn according to law, upon this oath, deposes  
and says:

1. I am a licensed physician in the State of New York.
2. I am today and have been board certified in Advanced Transplant Hepatology,  
Gastroenterology, and Internal Medicine by the American Board of Internal Medicine for  
more than five (5) years.
3. I have particular expertise in the general area or specialty involved in this action as I have  
devoted my practice substantially to the specialties of hepatology, gastroenterology, and  
internal medicine, for a period of at least five (5) years.

4. During the year preceding the date of the occurrence, and at the time of the occurrence, which is the basis for this claim or action, and through the present, I devoted a majority of my professional time to the active clinical practice of hepatology, gastroenterology and internal medicine, encompassing the medical condition that is the basis of the claim or action.
5. I have no financial interest in the outcome of the present case.
6. Based upon the medical records which I have reviewed, there is a reasonable probability that the care, skill or knowledge exercised or exhibited in the treatment, practice or work of the County of Hudson, New Jersey, Hudson County Correctional Center, CFG Health Systems, LLC, Evelyn Bernardo, Claudette Blake, Tammy Cooper, Daisy Doronila, Paul Ittoop, Jane Lowe, Teresa O'Brien, Myriam Sterlin, Eric Taylor, and any other presently unknown healthcare providers who treated Mr. Carlos Bonilla during the time period that is the subject of this claim or action, fell outside acceptable professional or occupational standards or treatment practices, and that such conduct caused or directly contributed to Mr. Bonilla's death.
7. I certify that the above statements made by me are true. I am aware that if any of the above statements made by me are willfully false, I am subject to punishment.

A handwritten signature in black ink, appearing to read "Alyson N. Fox", written over a horizontal line.

Alyson Fox, M.D.

State of New York )

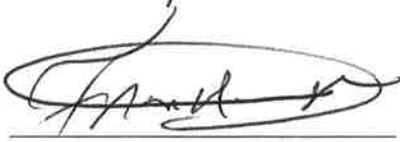
) ss.:

County of New York

Sworn to and subscribed

Before me on this 16

Day of August, 2019



Notary Public

**NOTICE**

**If any defendant contends that this Affidavit of Merit fails to completely satisfy the requirements of the Affidavit of Merit statute in any way, demand is hereby made that the defendant immediately notify the plaintiffs of any such alleged deficiencies so that the same may be corrected if necessary and within the time constraints of N.J.S.A. 2A:53A-26 et seq.**